UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
22-CR-224(4)(NEB/TNL)

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	**DEFENDANT'S MOTION**
v.	)	**TO CONTINUE SENTENCING**
	)	**DATE**
Filsan Mumin Hassan,	)	
	)	
	)	
Defendant.	)	

The Defendant, Filsan Hassan, by and through her undersigned attorney, respectfully requests the court continue her sentencing date and give counsel and Ms. Hassan additional time to prepare for the hearing.

As this Court is aware, Counsel is on the cusp of beginning a multi-defendant complex RICO trial, during which the sentencing is currently scheduled. While Counsel believed that she could adequately prepare for trial for one defendant and sentencing on another at the same time, on further reflection and review of pending obligations leading up to trial, trying to do both would limit the attention and care required for zealous advocacy of each client. Counsel will do a better job for Ms. Hassan if the hearing occurs after the trial.

Additionally, Ms. Hassan continues to need substance abuse treatment, and any undivided attention from that risks a relapse in this particularly vulnerable moment for her as she has faced recent challenges with sobriety. Moving the date will give her a longer period of programming and compliance, as well as more confidence appearing before a judge. Counsel wants Ms. Hassan to be feeling physically and mentally well for her hearing.

Ms. Hassan's case has been pending for years, and its conclusion requires that the best argument in her favor is made. Allowing Counsel to get through the trial and focus on Ms. Hassan's case when she has the time and bandwidth to accomplish that.

Counsel requests a date in late June or early July, with sentencing positions due two weeks prior.

The Government does not object to this request.

Respectfully submitted,

Dated: April 29, 2025   */s/Catherine Turner*
                                              Catherine L. Turner
                                              MN Attorney ID #0349057
                                              331 Second Avenue South
                                              Suite 705
                                              Minneapolis, MN 55401
                                              Tel: (612) 361-4895
                                              Fax: (866) 663-4338
                                              E-mail: ct@feddefense.com